

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION**

RODNEY JONES, et al.

PLAINTIFFS

v.

CIVIL ACTION NO. 3:20CV00308-MPM-RP

THE RAYMOND CORPORATION

DEFENDANT

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**DEFENDANT THE RAYMOND CORPORATION'S  
MOTION TO STRIKE TESTIMONY OF JOHN MEYER, Ph.D., P.E.**

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COMES NOW THE DEFENDANT, The Raymond Corporation ("Raymond"), by and through counsel, and submits this, its *Motion to Strike Testimony of John Meyer, Ph.D., P.E.* In support thereof, Raymond relies upon and adopts by reference as if set forth fully herein *Defendant The Raymond Corporation's Brief in Support of its Motion to Strike Testimony of John Meyer, Ph.D., P.E.*, as well as the following exhibits attached hereto:

1. **Exhibit A** – Judgment entered November 10, 2021, in *Anderson, et al. v. Raymond*, United States District Court for the Southern District of Illinois Case No. 19-CV-800;
2. **Exhibit B** – Verdict Form filed November 10, 2021, in *Anderson*;
3. **Exhibit C** – C.V. of John E. Meyer, Ph.D., P.E.;
4. **Exhibit D** – Excerpts from the Deposition Transcript of John E. Meyer, Ph.D., P.E., taken December 9, 2021;
5. **Exhibit E** – Excerpts from the Deposition Transcript of John E. Meyer, Ph.D., P.E., taken November 20, 2020, in *Anderson*;
6. **Exhibit F** – Report of John E. Meyer, Ph.D., P.E. dated October 4, 2021;
7. **Exhibit G** – Order & Reasons entered January 20, 2022, in *Vallee v. Crown Equipment Corp. of Ohio*, United States District Court for the Eastern District of Louisiana Case No. 20-CV-1571;
8. **Exhibit H** – Excerpts from the Deposition Transcript of Jason Kerrigan, Ph.D., taken December 8, 2021;

9. **Exhibit I** – Order entered July 27, 2021, in *Anderson*;
10. **Exhibit J** – Excerpts from the Deposition Transcript of Rodney Jones taken June 16, 2021; and
11. **Exhibit K** – Court’s Ruling dated January 21, 2020, in *Petersen v. Raymond*, United States District Court for the District of Utah Central Division Case No. 14-CV-00894.

WHEREFORE, PREMISES CONSIDERED, Raymond respectfully requests the Court grant its *Motion to Strike Testimony of John Meyer, Ph.D., P.E.*, and that such other relief to which it may be entitled in these premises be granted.

Respectfully submitted, this the 4<sup>th</sup> day of March, 2022.

THE RAYMOND CORPORATION  
By and through its attorneys,

s/ Francis H. LoCoco

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2022, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the follow to the following:

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Dated this the 4<sup>th</sup> day of March, 2022.

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